**Before the**
**Federal Communications Commission**
**Washington, D.C. 20554**

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| In the matter of | ) | |
| | ) | |
| | ) | ET Docket No. 02-312 |
| Biennial Review 2002 Comments | ) | FCC 02-266 |

# Comments of
# The Information Technology Industry Council

## INTRODUCTION

The Information Technology Industry Council (ITI) represents the leading U.S. providers of information technology products and services. ITI promotes the understanding of the networked world and the global competitiveness of leading information technology companies. Our mission is to advance open markets and the use of international standards and test methods.

ITI respectfully submits these Comments in response to ET Docket No. 02-312, The Commission*'s* 2002 Biennial Review of Telecommunications for the Office of Engineering and Technology (OET). These rules affect every electronic manufacturer from those making computers, routers, wireless LANs, and other information technology equipment.

## SECTION 2.948 DESCRIPTION OF MEASUREMENT FACILITIES

ITI recommends that references to out of date documents be updated as soon as practicable. Specifically, in Section 2.948(b)(8)(i), the Commission should update the

measurement standard from "American National Standards Institute (ANSI) C63.4-1992" to "American National Standards Institute (ANSI) C63.4-2001". The Commission should also update the publishing date of the document as well as the document number.

ITI also recommends the FCC update the reference in Section 2.948(d) from the "International Organization for Standardization/International Electrotechnical Commission (ISO) Guide 25, *General Requirements for the Competence of Calibration and Testing Laboratories*" to "International Organization for Standardization/International Electrotechnical Commission (ISO) 17025, *General Requirements for the Competence of Testing and Calibration Laboratories*".

The requirement of Section 2.948(a)(2) requires the description of the measurement facility to be filed with the Commission's Laboratory if the facility is submitting measurement data for Certification. The FCC proposed to remove this requirement provided the accrediting organization notifies the Commission of the laboratory name, address, contact information, scope of accreditation, date of accreditation and date for next review. [1] ITI continues to support that proposal and would also support direct submittal to the Commission of issued accreditation certificates in lieu of the full measurement facility description.

## SECTION 15.19 LABELING REQUIREMENTS

ITI recommends further simplification of product compliance labeling in order to save space on product information labels that must contain many country compliance marks, not only for EMC, but also for Safety and other requirements. ITI continues to support the Commission's DoC proposed product labeling simplification for removing

the phrases "For Home or Office Use" from Sections 15.19(b)(1)(i) and 15.19(b)(1)(ii) and "Tested to Comply with FCC Standards" from Section 15.19(b)(1)(i). [2] Final resolution for this NPRM has not been issued by the Commission. ITI encourages the FCC to issue their Report and Order for these changes as soon as practicable.

ITI continues to recommend additional simplifications for Verification and Certification processes. ITI recommends that "FCC Class A" (or "FCC-A") and "FCC Class B" (or "FCC-B") replace the current verification product compliance statement required by 47 CFR 15.19(a)(3):

> **This device complies with Part 15 of the FCC Rules. Operation is subject to the following two conditions: 1) this device may not cause harmful interference, and 2) this device must accept any interference received, including interference that may cause undesired operation.**

The above two-part statement should be included in the user manual in lieu of placement on the product compliance label where space is at a premium. Accordingly, this statement for certification should only be included in the user manual in a like manner as the FCC ID number present on the certified product indicates compliance.

ITI also recommends that the label of Section 15.19(b)(1)(i) be changed to just the "FCC Logo" that is currently on the label. Likewise, the label of Section 15.19(b)(1)(ii) is recommended to be changed to the "FCC Logo" accompanied by the words "Complete System Not Tested". These changes will save valuable real estate on product compliance labels that are currently crowded with a growing number of various agency compliance statements and marks.

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[1] ET Docket No. 01-278.
[2] ET Docket No. 01-278.

As indicated in our earlier comments, ITI recommends the Commission codify the common practice of allowing the placement of "Trade Name" and "Model Number" at other locations on the product's compliance label instead of next to the FCC logo. As described previously, this practice saves valuable real estate. Otherwise, valuable label real estate is wasted with redundant displays of these product identifiers.

## ELECTRONIC LABELING

The Commission seeks comments on whether the Rules should be amended to allow electronic labeling of products, in lieu of traditional labels as are presently used. Electronic labeling allows the identification information for a product such as the FCC identification number to be displayed by means such as a light emitting diode (LED) or liquid crystal display (LCD) screen rather than on a printed label affixed to the product. This is already done for Software Defined Radios. This change would reduce costs for products which already have such displays since the identifying marks could be maintained in NVRAM and displayed on start-up, or on demand while the product is operating.

## ALTERNATIVE CONSUMER INFORMATION MEDIA

ITI requests permitting information technology manufacturers to provide the required information to users on whatever form the user manual is provided be adopted. This means that paper, computer disk, CD-ROM or the Internet would be acceptable media for transmitting the FCC required user information to the user. The Commission is particularly interested in comments on using the Internet as the delivery medium to the

user as they relate to potential accessibility problems for consumers without Internet access.

ITI expressed through an earlier rulemaking a desire for user warnings and information statements to be included in the same medium as the user manual resulting in a cost savings to industry. [3] ITI maintains that limiting consumer access to this information through the Internet is justified since these products would not function properly without Internet access and thus, an inability to access the information would be immaterial.

## SECTION 15.31 MEASUREMENT STANDARDS

ITI requests the Commission update the measurement standard from "American National Standards Institute (ANSI) C63.4-1992" to "American National Standards Institute (ANSI) C63.4-2001" in Section 15.31(a)(6) as well as update the published date and the document number. This version has been obsolete for three years with the publication of ANSI C63.4-2001. Also, ITI requests the Commission amend this section to indicate that these standards are also available for purchase and immediate download from the IEC webpage at http://www.iec.ch.

Additionally, as in our earlier comments to ET Docket No. 01-278, ITI urges the Commission to accept CISPR 22:1997 as amended as an alternate measurement procedure to ANSI C63.4-2001 for measurement of information technology equipment. ANSI C63.4-2001 and CISPR 22:1997 are very similar in requirements and supporting figures.

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[3] ITI Comments to the Commission's Review of part 15, ET Docket 01-278.

Specifically, CISPR 22:1997 Amendment A1:2001 requires the use of ferrites on cables that exit the radiated test facility for tabletop products. This requirement becomes mandatory in Europe on August 1, 2003. [4] All other country EMI standards are CISPR-based as well, and will also become effective in 2003 . If the FCC does not accept CISPR 22 as an alternate test method worldwide, tabletop products with telecom/LAN ports will unnecessarily be tested twice for radiated emissions. A second test results in unnecessary economic impact to the product manufacturer. A radiated emission test ranges from $2500 to $4000 depending upon product complexity and type of emission test facility used.

## SECTION 15.203 ANTENNA REQUIREMENTS – UNIQUE CONNECTORS

**An intentional radiator is required under Section 15.203 to ensure that no antenna other than the one furnished by the responsible party be used in a device. A permanent attachment and the use of a unique connector are permitted, however, a permanent connection is not efficient for assembly or repair when the antenna is remotely located from the transmitter card when installed in a host unit. Also, unique connectors do not remain unique very long. Therefore, ITI requests that Section 15.203 be deleted from the FCC Rules.**

## SECTION 15.209 RADIATED EMISSIONS, GENERAL REQUIREMENTS

The radiated emissions limits for an intentional radiator are specified in Section 15.209(a). Many intentional radiators are tested as a subassembly of an Information Technology Equipment unintentional radiator. The host is normally tested to CISPR 22 limits to comply with various worldwide national regulations. This testing should also be applicable to satisfy the requirements of Section 15.209 in the range of 30 MHz to 1000 MHz. The falloff between 3 and 10 meters is known to not be 20 dB/decade as the rules

[4] EN 55022:1998 Amendment A1:2001.

allow for test distance conversion between 3 and 10 meters. An additional test at 3 meters is required to ensure compliance to Section 15.209 limits. This additional test has an adverse economic impact to the product manufacturer.

ITI recommends the Commission allow the use of alternate Class B CISPR 22 radiated limits in the frequency range of 30 MHz to 1000 MHz. This is consistent with the allowed use of CISPR 22 emission limits in Section 15.109(g) for unintentional radiators.

## SECTION 15.407 GENERAL TECHNICAL REQUIREMENTS

Section 15.407(d) is very specific in its requirement that "any U-NII device operating in the 5.15 – 5.25 GHz band shall use a transmitting antenna that is an integral part of the device. This statement is more restrictive than the antenna requirement in Section 15.203. As a result, the antenna is permanently affixed to the transmitter or built into the final assembly in a manner that the end user does not have access or ability to separate and exchange them.

ITI believes the requirements of Section 15.407(d) that require an integral antenna for products operating in the 5150-525- MHz bands are unnecessary. According to Section 15.407(e), the device is already restricted for outdoor use only. Furthermore, under section 15.407(a), the power for this type of device is already restricted to a maximum of 50mW. ITI believes the requirements in Section 15.407(a)(1) restricting antenna gain to a maximum of 6dBi without power reduction, limiting the power to 250 mW EIRP, and limiting systems to indoor use only provide adequate protection for MSS feeder links. Therefore, ITI recommends that Section 15.407(d) be removed.

## MISCELLANEOUS

ITI encourages the Commission clarify by rule or public notice their definition of professional installer by adopting the industry definition set forth by the Unlicensed Wireless Systems Installer Certification program that is administered by the National Association of Radio and Telecommunications Engineers (NARTE).

## CONCLUSION

ITI welcomes the opportunity to offer these suggestions for changes and clarifications to the Commission's rules. We believe these suggestions will result in simplification of implementation, and cost savings, while still protecting the consumers. ITI is pleased that the Commission recognizes the needs of IT equipment manufacturers through the simplification and improvement of the Rules.

Respectfully submitted,

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